

# Engineers Comments Regarding Surface Water Drainage

<b>Application Reference:</b>	AL/84/25/PL	<b>Reviewer Reference:</b>	ADC/KW and SB
<b>Planning Officer:</b>	Harry Chalk	<b>Date of Review:</b>	19/11/2025
<b>Site Name:</b>	The Grange, Westergate Street, PO20 3SQ		
<b>Application Description:</b>	Removal of mobile home and replacement with 1 No self build dwelling and associated works (alternative to AL/150/22/PL).		
<b>Assessment Number:</b>	1 of 1		

## Policy and Guidance Information

Arun District Council Surface Water Drainage Guidance (including design checklists) - <https://www.arun.gov.uk/surfacewater>

Land Drainage Consent – <https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/>

Arun District Council Land Drainage Byelaws - <https://www.arun.gov.uk/byelaws/>

Arun District Council surface water pre-commencement conditions - <https://www.arun.gov.uk/planning-pre-commencement-conditions>

The National Standards for SuDS - <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

The SuDS Manual [C753] by CIRIA

Response	Objection

## References

The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). The PPG guides local planning authorities to refer to 'Sustainable drainage systems: non-statutory technical standards' [NsTS] and detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems for non-major development.

The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.

This consultation has been primarily informed by the NSfS and The SuDS Manual.

## Summary

This summary highlights if critical items aligning with each of the standards have been met. Critical items are highlighted in **bold** on our surface water drainage design checklist (linked above). A failure to address these will likely result in an objection to an objection to a full or reserved matters planning application.

If any of these items are inadequately addressed by the submission, then their correction may result in a redesign of the surface water drainage scheme. A redesign is likely to have site wide implications such as the potential for storage structures to increase in volume or plan area, or the provision of other important infrastructure to satisfy the NSfS set out below.

A full written explanation of the assessment and response is given in the consultation comments to the planning officer.

Standard	Assessment	Response
1. Runoff destination	Insufficient	<b>Objection</b>
2. Interception drainage	Insufficient	<b>No objection subject to conditions</b>
3. Extreme Rainfall and Flooding	Insufficient	<b>Objection</b>
4. Water Quality	Insufficient	<b>No objection subject to conditions</b>
5. Amenity	Insufficient	<b>No objection subject to conditions</b>
6. Biodiversity	Insufficient	<b>No objection subject to conditions</b>
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	<b>No objection subject to conditions</b>

## Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

**Foul and Surface Water Drainage Report 10 June 2025 Rev P1**

## Consultation comments to the planning officer

### 0. General

#### 1. Runoff destination

1.1 It is proposed to manage surface water on-site via water reuse and attenuated permeable paving, which discharges to a ditch on the northern boundary of site. The groundwater monitoring provided, has evidenced that infiltration to ground would be unviable due to its depth below ground level not allowing for 1m of unsaturated ground.

- 1.2 The proposed final discharge location of the watercourse north of the site, is the next priority discharge location on the hierarchy and as such we support the connection should permission be granted.
- 1.3 The Lead Local Flood Authority (LLFA - WSCC) is the risk management authority for the ordinary watercourse. No evidence has been submitted to demonstrate that the proposed discharge rates, volumes or flow parameters have been agreed with them. This is an expectation of the NSfS. Consent may also be required from the LLFA for any proposed works to the watercourse.
- 1.4 In additional Arun District Council consent relating to the Land Drainage Bylaws may also be required. Please contact ADC at [land.drainage@arun.gov.uk](mailto:land.drainage@arun.gov.uk). If permission from the relevant authority is not obtained for the principle of discharging to the watercourse, then it is unclear how the applicant may drain surface water from the site.
- 1.5 In the absence of confirmation of an acceptable discharge location **we object** to the application.
- 1.6 No details of the existing drainage features have been provided. In the case of onsite drainage features (such as historic soakaways – if any exist) this does not justify an objection to the scheme. It would be likely that any existing systems would be removed during remediation of the site prior to construction of the new dwelling.
- 1.7 The application site is in the Lidsey Wastewater Treatment Catchment Area. This catchment is the subject of a surface water management plan due in part to the recognised history of foul sewer flooding. The site is within a local flood risk zone identified within the surface water management plan [LFRZ\_018]. The plan states that flood risk from public sewers is high and from pluvial sources it is medium. It states that hydraulic overload of the foul sewer system is confirmed in the flood risk zone. Therefore, it is important to ensure that future development does not exacerbate this problem.

## 2. Interception drainage

- 2.1. The applicant has proposed a bioretention garden feature and permeable paving. In recognition that the National Planning Policy Framework states that SuDS should be proportionate to the nature and scale of the proposal we are willing to accept that the following interception features can demonstrate compliance without further detailed assessment.
  - infiltration features designed to meet extreme rainfall standards.
  - water butts or other means of reuse that are not designed for regular daily demand attached to all new downpipes.
  - raingardens and bioretention features attached to all new downpipes.
  - permeable surfacing.

- 2.2. These features will not affect the scale or layout of development and as such can be secured by condition.

## 3. Extreme rainfall and flooding

- 3.1. A discharge rate of 1 l/s has been suggested to discharge surface water at a reduced rate to the ditch while preventing blockage of the discharge system. However, no justification or calculations have been provided to support the use of this rate. Discharge rates should achieve QBAR (greenfield 50% AEP) or 3 l/s/ha (whichever is greater). Without these details, it is not possible to

confirm whether the proposal complies with guidance and it will not lead to an increase in flood risk on site or elsewhere.

- 3.2. As the discharge rate directly correlates with the volume of storage required on site, **we object** to the proposal on this basis. If the proposed discharge rate requires amendment once fully justified, this may impact the scale and layout of the development.
- 3.3. Surface water drainage calculations require checking; the designer should ensure that plans and calculations accurately correspond. For example, the cover level for the permeable paving input into the calculations does not reflect the lowest cover level shown on the plan. This artificially increases the storage depth in those areas, affecting the storage volumes within the paved attenuation feature. The network model must be accurate for the shallowest depth of storage.
- 3.4. Furthermore, an incorrect porosity value of 1 has been afforded to the bioretention planter, when in reality the substrate present in the planter will impact the storage volumes available.
- 3.5. Despite various minor errors being picked up, the critical 1% AEP plus climate change allowance (CCA) event simulation demonstrates ample capacity in the system (as designed with the discharge rate of 1l/s). It is unclear if there is enough spare capacity to accommodate the design changes that may be needed. To note, when a detailed design is undertaken, we would expect no flooding of the system to be demonstrated in the critical 3.33% AEP + CCA event. If flooding is allowed for on the 1% AEP + CCA event, then it must be safely contained on site in accordance with the NSfS.

#### 4. Water quality

- 4.1. A water quality assessment has been submitted. The assessment provided is sufficient for the size of development and the submission of further details is unlikely to affect the scale and layout. No objection on this ground, subject to securing full details at condition.

#### 5. Amenity

- 5.1. A bioretention planter and permeable paving have been specified to manage water falling on the impermeable contributing area. The proposed SuDS demonstrate multifunctional benefits and therefore complies with Standard 5 of the NSfS. The submission of further details is unlikely to affect the scale or layout of the development, and we do not therefore object on this basis. Accordingly, subject to a condition securing those details, the proposed SuDS will deliver amenity benefits.

#### 6. Biodiversity

- 6.1. There is no formal assessment of biodiversity benefit, and the preliminary ecological appraisal report does not appear to consider or acknowledge the SuDS design in delivering ecological and biodiversity benefit. However, it is believed that when the biodiversity benefit of the drainage system is properly assessed it will be found to have a positive contribution. This is because it includes an bioretention planter storage feature. As such we have no objection subject to a condition which will secure the details of any biodiversity benefit delivered by the SuDS.

#### 7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS. However, in the absence of significant existing trees which could impact the scale and layout and location of SuDS features, most elements of this standard can normally be secured via condition. The submission of a Management and Maintenance Plan is unlikely to affect the scale or layout of the development. Accordingly, we do not

object to the proposal on these grounds, subject to a condition securing the detailed surface water drainage design.

**8. Suggested conditions / Overcoming the objection**

8.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

**8.2. The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.**

8.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

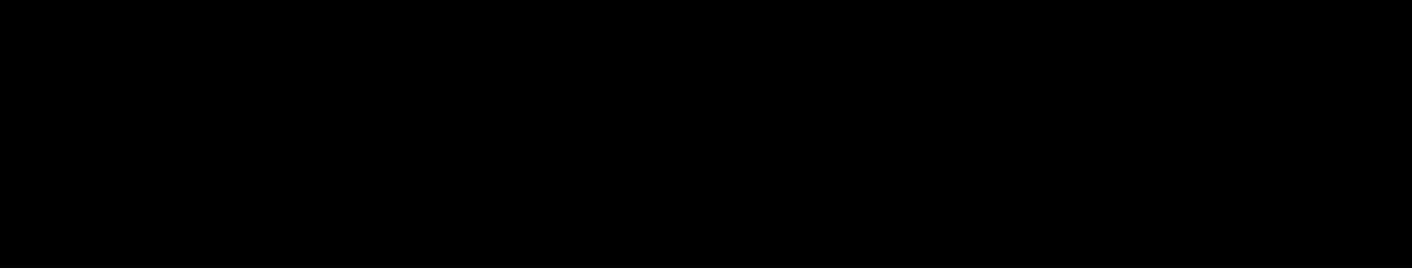
### **Drainage Impact on Other Planning Matters**

This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

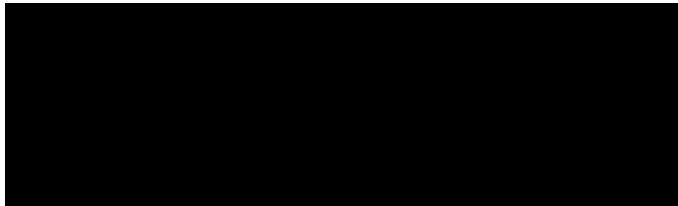
Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that they have been assessed for any other purpose. The planning officer is advised to check for conflicts with any existing approved plans and to consult any relevant consultees as appropriate.

It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- Landscaping officer (proposed trees and landscaping)
- Tree officer (existing trees)
- Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- Southern Water (foul drainage and surface water disposal to public sewer network/groundwater source protection zones)
- Portsmouth Water (groundwater source protection zones)
- Lead local flood authority (all other sources of flooding and ordinary watercourses)
- Other: Specify .....
- None



Drainage Engineers response



Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

To register to receive notifications of planning applications in your area please go to  
<https://www1.arun.gov.uk/planning-application-finder>



#### Our priorities...



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**From:** Kathryn Welch <Kathryn.Welch@arun.gov.uk>

**Sent:** 19 November 2025 13:03

**To:** Planning.Responses <Planning.Responses@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>

**Cc:** Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>

**Subject:** RE: Planning Consultation on: AL/84/25/PL

Please find attached our consultation response; an objection.

Many thanks,

**Kathryn Welch**

## Senior Planning Officer, Planning Department

**Please note:** My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

**T:** 01903 737789

**E:** [kathryn.welch@arun.gov.uk](mailto:kathryn.welch@arun.gov.uk)

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### Our priorities...



**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 29 September 2025 14:34

**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Subject:** Planning Consultation on: AL/84/25/PL

To: Engineers (Drainage)

### NOTIFICATION FROM ARUN DISTRICT COUNCIL

**Town & Country Planning Act 1990 (as amended)**

**Town and Country Planning (Development Management Procedure) (England) Order 2015**

#### Planning Permission

**Application No:** AL/84/25/PL

**Registered:** 29th September 2025

**Site Address:** The Grange Westergate Street Westergate PO20 3SQ

**Grid Reference:** 493982 104365

**Description of Works:** Removal of mobile home and replacement with 1 No self build dwelling and associated works (alternative to AL/150/22/PL). This application is in CIL Zone SD5 BEW Strategic Site and is Zero Rated for CIL.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

Should you have any comments to make, these should be sent by replying to this email by 30th October 2025 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

**Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.**

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website:<https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Harry Chalk

Planning Officer- Arun District Council

Telephone: 01903 737577

Email: [harry.chalk@arun.gov.uk](mailto:harry.chalk@arun.gov.uk)

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